IN THE DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

٧.

LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, PORT HAMILTON REFINING AND TRANSPORTATION, and WEST INDIES PETROLEUM, LTD.,

Defendant.

Case No. 1:23-CV-00012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

NOTICE OF DEPOSITION OF CHRISTINE GOODRICH

TO: Glenda L. Lake, Clerk of the Court District Court of the V.I.

Donnie King 201 East Las Olas Boulevard, Suite 1800 Fort Lauderdale, FL 33301

Reginald E. Janvier, Esq. 201 East Los Olas Boulevard, Suite 1800 Fort Lauderdale, FL 33301 Attorney for Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals

Andrew C. Simpson
2191 Church Street, Suite 5
Christiansted, VI 00820
Attorney for Port Hamilton Refining and Transportation Port Hamilton Refining and Transportation

Ryan C. Stutzman Esq. 1138 King Street Suite 100 Christiansted, VI 00820 Attorney for West Indies Petroleum, Ltd.

Susan Nissman-Coursey



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NOTICE OF DEPOSITION OF CHRISTINE GOODRICH

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Caribbean Scribes, Inc.

1244 Queen Cross Street, Suite 1A

Christiansted, VI 00820

PLEASE TAKE NOTICE that pursuant to Virgin Islands Rules of Civil Procedure

26, 30 and 32 Federal Rules of Civil Procedure 26, 30 and 32 Plaintiff, by and through

undersigned counsel, will take the oral examination of CHRISTINE GOODRICH on May

20, 2025 at 8:30 a.m. AT/ET via ZOOM before any Notary Public commissioned by the

Territory of the US Virgin Islands or other person qualified to administer the oath and take

deposition.

This deposition is being taken for use as evidence and/or trial purposes, and will

be continued from day to day until completed. This deposition will be recorded by

stenographic, voice, and/or audio/video means and will be zoom video recorded. If the

deposition officer or witness is attending remotely, the parties agree to the remote

administration of the oath.

RESPECTFULLY SUBMITTED LEE J. ROHN AND ASSOCIATES, LLC

Attorneys for Plaintiff

DATED: May 6, 2025

BY: /s/ Robin P. Seila

Robin P. Seila, Esq.

VI Bar No. R2043

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U.S. Virgin Islands 00820

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on May 6, 2025, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

All counsel of record.

BY: <u>/s/ Robin P. Seila</u> (gf)